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Attorneys for Plaintiffs
 SAFE Financial LLC, a Delaware limited
 liability company, and SSC Service Corp.,
 a California corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SAFE FINANCIAL LLC, a Delaware limited
 liability company, and SSC SERVICE CORP.,
 a California corporation,

Plaintiffs,

vs.

PERIMETER SECURITY SOLUTIONS,
 L.L.C., a Georgia limited liability company, and
 ROBERT H. SMITH, an individual,

Defendants.

Case No. C 04-04084 MJJ ARB

**STIPULATION TO CONTINUE
 DEADLINE TO COMPLETE
 MEDIATION AND CASE
 MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER**

Date: August 16, 2005

Time: 2:00 p.m.

Place: Courtroom 11, 19th Floor

Judge: Hon. Martin J. Jenkins

The parties to the above-entitled action jointly submit this Stipulation and request the Court to adopt it as its Order in this case.

Pursuant to the Court's March 15, 2005 Pretrial Order and ADR Local Rule 6-4(b), the deadline to conduct a mediation was June 14, 2005, and a further Case Management Conference is scheduled for August 16, 2005. However, due to scheduling conflicts involving counsel, the parties, and the mediator, the parties were unable to conduct the mediation by June 14, 2005. The parties have agreed to participate in a mediation on September 13, 2005 at 10:00 a.m. Since conducting a further Case Management Conference prior to the mediation would be premature, the parties also agree to a continuance of the further Case Management Conference to a convenient date in October 2005.

1 DATED: June 21, 2005

DLA PIPER RUDNICK GRAY CARY US LLP

2
3 By: Jamie S. Peterson
4 Jamie S. Peterson
5 Attorneys for Plaintiffs
6 SAFE Financial LLC, a Delaware limited liability
company, and SSC Service Corp., a California
corporation

7 DATED: June __, 2005

VALINOTI & DITO

8
9 By: _____
10 Kenneth L. Valinoti
11 Attorneys for Defendants
12 Perimeter Security Solutions, a Georgia limited
liability company, and Robert H. Smith

13 DATED: June __, 2005

LAW OFFICES OF MARCUS D. MERCHASIN

14
15 By: _____
16 Marcus D. Merchasin
17 Attorneys for Third-Party Defendant
Dean Cromer

18 **CASE MANAGEMENT ORDER**

19 The parties shall participate in and complete their mediation no later than September
20 16, 2005. The further Case Management Conference in this action, currently scheduled for August
21 16, 2005, is hereby continued to October __, 2005, at 2 p.m. in Courtroom 11.

22 IT IS SO ORDERED.

23
24 DATED: _____

25 _____
26 Hon. MARTIN J. JENKINS
27 United States District Court Judge
28

1 DATED: June __, 2005

DLA PIPER RUDNICK GRAY CARY US LLP

3 By: _____

Jamie S. Peterson
Attorneys for Plaintiffs
SAFE Financial LLC, a Delaware limited liability
company, and SSC Service Corp., a California
corporation

7 DATED: June 21, 2005

VALINOTI & DITO

9 By: 

Kenneth L. Valinoti
Attorneys for Defendants
Perimeter Security Solutions, a Georgia limited
liability company, and Robert H. Smith

12 DATED: June __, 2005

LAW OFFICES OF MARCUS D. MERCHASIN

15 By: _____

Marcus D. Merchasin
Attorneys for Third-Party Defendant
Dean Cromer

18 **CASE MANAGEMENT ORDER**

19 The parties shall participate in and complete their mediation no later than September
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21 16, 2005, is hereby continued to October __, 2005, at 2 p.m. in Courtroom 11.

22 IT IS SO ORDERED.

24 DATED: _____

Hon. MARTIN J. JENKINS
United States District Court Judge

28 STIPULATION FOR CONTINUANCE
~S\NF1:315742.v1

-2-

DATED: June __, 2005

DLA PIPER RUDNICK GRAY CARY US LLP

By: _____

Jamie S. Peterson
Attorneys for Plaintiffs
SAFE Financial LLC, a Delaware limited liability
company, and SSC Service Corp., a California
corporation

DATED: June __, 2005

VALINOTI & DITO

By: _____

Kenneth L. Valinoti
Attorneys for Defendants
Perimeter Security Solutions, a Georgia limited
liability company, and Robert H. Smith

DATED: June 20, 2005

LAW OFFICES OF MARCUS D. MERCHASIN

By: _____

Marcus D. Merchasin
Attorneys for Third-Party Defendant
Dean Cromer

CASE MANAGEMENT ORDER

The parties shall participate in and complete their mediation no later than September 16, 2005. The further Case Management Conference in this action, currently scheduled for August 16, 2005, is hereby continued to October 18, 2005, at 2 p.m. in Courtroom 11.

IT IS SO ORDERED.

DATED: 6/23/2005

/s/

Hon. MARTIN J. JENKINS
United States District Court Judge

